



*General Electric Company
One Neumann Way MD Y6
Cincinnati, OH 45215*

May 19, 2004

DJB/001/04

U.S. Department of Transportation,
Docket No. FAA-2003-16685,
400 Seventh Street, SW.,
Nassif Building
Room PL-401,
Washington, DC 20590-001

Subject: Comments on NPRM for Establishment of Organization Designation Authorization Procedures

References: 14 CFR Parts 21, 121, 135, 145 and 183 33

Gentlemen,

GE Aircraft Engines has reviewed FAA Docket No. FAA-2003-16685, which provides for the establishment of Organization Designation Authorization (ODA) procedures and would like to provide the following comments:

First, GE welcomes the advent of the ODA rule. It is particularly satisfying for us long-time members of the ARAC Delegation Working Group to see that the FAA has left the NPRM's spirit and content intact and true to the original mission.

Section 183.47 – With its current language, the rule states that only applicants with facilities in the United States will be issued an ODA. GE wishes to emphasize the importance of allowing organizations outside the US to have an ODA. GE feels that since language already exists describing the discretionary nature of granting ODA, automatically disallowing ODA application by foreign entities is unwarranted and should be removed. Like all other applicants, foreign entities, would have to prove their case that an ODA is in the FAA's best interest. For GE, which is a partner in the French CFM International Company, such a case could be easily made. Also, since companies located in EU member states will be required to have EASA Design Organization Approval as well, there is opportunity for harmonization of the two rules.

Section 183.45 (a) - The proposed rule indicates that the letter of designation will include an expiration date. GE feels that there should be no expiration date to such a delegation. The proposed rule developed by the ARAC WG did not include an expiration date. Instead, the ODA letter of designation would remain in effect until surrendered by the applicant or the FAA revokes the approval. Also, application of an expiration date will create a significant workload for the FAA in renewing these designations. This will have the effect of diverting critical FAA resources away from higher priority activities, which is contrary to one of the goals of the ARAC activity relative to ODA.

Section 183.55 - The pre-amble implies that the FAA would approve the individuals in ODA much

like it does for designees today for the DOA, DAS and SFAR-36. This is contrary to the direction the FAA gave the ARAC WG, in developing the ODA proposed rule. FAA made it clear that the requirement for designee selection for an ODA was to be based on an FAA approved *system* contained in the ODA rather than based on the individual as it is for today's designees. FAA oversight should focus on compliance with the *process*, and not the *individuals*. Again, if FAA focuses on the individual, even during any "transitional period", this will have the effect of diverting critical FAA resources away from higher priority activities, which is contrary to one of the goals of the ARAC activity relative to ODA. GE would like the FAA to make it clear in the pre-amble that ODA designee selection will be by the FAA approved ODA process and any transitional period would be at the discretion of the individual ACO based upon the qualifications of a particular ODA applicant.

Other:

Somewhere in the Background or General Discussion material, GE feels strongly that the FAA must address interaction of an ODA with foreign authorities, particularly with EASA. We feel the FAA should acknowledge the need and state its intent to engage in bilateral discussions with EASA for mutual acceptance of approvals under the FAA ODA and EASA DOA systems. Based upon GE's recent experience on the CFM International program, failure to do so can lead to serious disruption to the Authorities, OEMs, Repair Stations and Operators.

We would like to thank the FAA for the opportunity to comment on FAA regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Blazey', with a long horizontal line extending to the right.

Jeff Blazey
GE & CFM FAA DER
FAA ODA & EASA DOA Focal Point
Past Member, ARAC Delegation Working Group

Email: jeff.blazey@ae.ge.com
Phone : (513) 552-3105
Fax: (513) 552-3489